

PLAINTIFFS' EXHIBIT LIST

EXHIBIT	BATESTAMP
Tom Innes Declaration	REMICK0000185-191
Excel Spreadsheets documenting failed remote legal visits	REMICK0000047, 0000048
Undelivered legal mail for DB, CJ, BD; Innes Decl. ¶ 17a-c	REMICK0000201-0000206
Undelivered legal mail for DK, Innes Decl. ¶ 17d	REMICK0000207-0000208
Undelivered legal mail for AW, Innes Decl. ¶ 16a	REMICK0000212-0000213
Undelivered legal mail for TO, Innes Decl. ¶ 16b	REMICK0000214-0000215
Undelivered legal mail for MC, Innes Decl. ¶ 16c	REMICK0000216-0000217
Undelivered legal mail for DT, Innes Decl. ¶ 16d	REMICK0000218-0000219
Undelivered legal mail for RP, Innes Decl. ¶ 16e	REMICK0000220-0000221
Undelivered legal mail for GW, Innes Decl. ¶ 16f	REMICK0000222-0000223

Undelivered legal mail for JW, Innes Decl. ¶ 18a	REMICK0000229-0000232
Undelivered legal mail for SB, Innes Decl. ¶ 18b	REMICK000237-000240
Undelivered legal mail for JS, Innes Decl. ¶ 19	REMICK0000241-0000244
Marni Jo Snyder Declaration	REMICK0000104-0000151
Natasha Felder Declaration	REMICK0000152-0000155
Leroy Yoder Declaration	REMICK0000101-0000103
Noah Kolbi-Molinas Declaration	REMICK0000156-0000158
Stefanie Sherr Declaration	REMICK0000180-0000182
Theophe Love Declaration	REMICK0000183-0000184
PDP Policy and Procedures, 3.F.8. (Inmate Legal Mail)	CITY_001870-001875
CFCF Legal Mail Unit Log Sheets for 12/1/2021 to 12/8/2021, as provided by Defendants	CITY_000680-007715
Excerpts from Corizon Grievance log	CITY_000018, CITY_000051, CITY_000062, CITY_000066
Backlogged appointments chart: CFCF	CITY_002070
Nov. 2021-Jan 2022 Medical Reports by Facility (PICC and RCF)	CITY_002776-002780 CITY_002805-002809 CITY_002835-002839 CITY_002864-002868 CITY_002894-002898 CITY_002921-002925 CITY_002950-002959 CITY_002978-002979 CITY_002991-002992 CITY_003008-003009 CITY_003024-003025 CITY_003045-003046 CITY_003062-003063 CITY_003080-003081 CITY_003098-003099 CITY_003116-003117

Corizon/PDP Data Nov-Dec 2021	CITY_003983-004026
Behavioral Health Timeliness Chart	CITY_004027
Intake Timeliness Chart	CITY_004028
Backlogged Appts Chart: CFCF	CITY_004029
Backlog Offsite Clinic Trips Chart	CITY_004030
Sick Call Timeliness	CITY_004031
Segregation Placement Records	CITY_004443-004444, CITY_005576
PDP Self-Harm or Suicide Chart	CITY_004032
Deputy Commissioner Meeting Notes	CITY_009783-009784, CITY_009797-009798
Excerpted medical records of class members	REMICK0000265-0000281
DHO Hearing Recommendations Resulting in Punitive Segregation January 01, 2021 to Present	CITY_001900-CITY_002001
Letter from Sholonda Gregory to Mayor Kenney (dated October 5, 2021)	
Heather Malloy Declaration, with ¶14 attachment: resignation memo	REMICK0000253-0000259
Malloy Decl. ¶ 7 attachment: Partial RCF log	REMICK0000252
Dawn Johnson Declaration	REMICK0000247-0000249
Johnson Decl. ¶ 7 attachments: Dawn Johnson disciplinary report, memo and email regarding broken console	REMICK0000245-0000246 REMICK0000250 REMICK0000260
Johnson Decl. ¶ 6 attachments: Dawn Johnson disciplinary report regarding reports of unfit conditions at Mod 3	REMICK0000261-0000264

Declaration of Deputy Commissioner Xavier Beaufort (dated Feb. 11, 2022)	ECF No. 138-2
Declaration of Bruce Herdman (dated Feb. 11, 2022)	ECF No. 138-1
Photos from Jail Tour of March 9, 2022	REMICK0001364-0002202
Official Statement of City of Philadelphia Controller Rhynhart, "Controller Rhynhart Calls for Staffing Increase at Philadelphia Prisons Department to Improve Safety for Correctional Officers and Inmates" (June 29, 2021)	https://controller.phila.gov/wp-content/uploads/2021/06/6-29-Controller-Rhynhart-Calls-for-Staffing-Increase-to-Improve-Safety-for-Correctional-Officers-and-Inmates.pdf
Official Statement of City of Philadelphia Controller, "City Controller Rhynhart Releases Statement on Deaths at Philadelphia Prison Facilities" (July 30, 2021)	https://controller.phila.gov/wp-content/uploads/2021/07/7-30-City-Controller-Rhynhart-Releases-Statement-on-Deaths-at-Philadelphia-Prison-Facilities.pdf
Letter from Claire Shubik-Richards to Commissioner Carney (dated May 26, 2021)	REMICK00015550-0001557
Letter from Commissioner Carney to Claire Shubik-Richards (dated May 26, 2021)	REMICK0001560-0001561
Memo from Claire Shubik-Richards to Commissioner Carney (dated July 13, 2021)	REMICK0001562-0001572
Letter from Commissioner Carney to Claire Shubik-Richards (dated July 21, 2021)	REMICK0001573-0001576
Letter from Claire Shubik-Richards to Commissioner Carney (dated August 19, 2021)	REMICK0001577-0001578
Memo from Claire Shubik-Richards to Commissioner Carney (dated September 9, 2021)	REMICK0001579-0001589
Letter from Claire Shubik-Richards to Commissioner Carney (dated November 8, 2021)	REMICK0001590-0001592
Memo from Claire Shubik-Richards to Commissioner Carney (dated March 1, 2022)	REMICK0001594-0001603
Expert report of Brad Hansen (dated March 21, 2022)	

Sept. 30, 2021 video	https://www.inquirer.com/news/philadelphia-jails-staffing-shortage-assault-20211104.html
Aug. 13, 2021 video	https://www.inquirer.com/news/philadelphia-jails-staffing-shortage-assault-20211104.html
PDP Policy 3.D.3: Unit Management	CITY_002109-002117
PDP Policy 3.A.8: Use of Force and Restraints	
Emergency Staffing Reports, Nov. & Dec. 2021	CITY_002225-002717
Workforce TeleStaff Roster Report, 12/14/21, 12/8/21	CITY_005630-005638
Use of force documents, 8/4/21 CFCF	CITY_004065-004066
Use of force documents, 8/4/21 CFCF	CITY_004086-004088, CITY_004096-004097, CITY_004100
Use of force documents, 8/9/21 CFCF	CITY_004154, CITY_004156
Use of force documents, 8/12/21 CFCF	CITY_004177
Use of force documents, 9/14/21 CFCF	CITY_004301, CITY_004303, CITY_004315
Use of force documents, 9/21/21 CFCF	CITY_004455
Use of force documents, 9/25/21 CFCF	CITY_004382-004390
Use of force documents, 9/27/21 CFCF	CITY_004455-004459
Use of force documents, 10/1/21 CFCF	CITY_004536
Use of force documents, 10/11/21 CFCF	CITY_004593, CITY_004596

Use of force documents, 10/16/21 CFCF	CITY_004655
Use of force documents, 11/11/21 CFCF	CITY_004822, CITY_004826-004827, CITY_004837
Use of force documents, 11/11/21 CFCF	CITY_004847, CITY_004860
Use of force documents, 12/1/21 CFCF	CITY_005156, CITY_005159
Use of force documents, 12/5/21 CFCF	CITY_005526, CITY_005542-005543
Use of force documents, 12/8/21 CFCF	CITY_005566, CITY_005571, CITY_005572, CITY_005576
Use of force documents, 12/14/21 CFCF	CITY_005639
Use of force documents, 12/16/21 CFCF	CITY_005718-5719, CITY_005737
Use of force documents, 12/20/21 CFCF	CITY_005840, CITY_005868
Use of force documents, 12/21/21 CFCF	CITY_005876
Use of force documents, 1/2/22 CFCF	CITY_005929
Use of force documents, 1/7/22 CFCF	CITY_005962
Use of force documents, 1/24/22 CFCF	CITY_006192, CITY_006201
Use of force documents, 8/2/21 RCF	CITY_006246
Use of force documents, 8/7/21 RCF	CITY_006310
Use of force documents, 8/9/21 RCF	CITY_006351
Use of force documents, 8/12/21 RCF	CITY_006422

Use of force documents, 8/23/21 RCF	CITY_006456-6457, CITY_006465
Use of force documents, 8/25/21 RCF	CITY_006530
Use of force documents, 8/27/21 RCF	CITY_006582
Use of force documents, 8/31/21 RCF	CITY_006698, CITY_006718
Use of force documents, 9/11/21 DC	CITY_006802
Use of force documents, 10/23/21 RCF	CITY_007400-007401
Use of force documents, 1/11/22 RCF	CITY_007584, CITY_007594
Use of force documents, 1/12/22 DC	CITY_007598
Breyon Hare Declaration	ECF No. 85-3
Mark Henderson Declaration	ECF No. 85-3
Kenyatta White, Jr. Declaration	ECF No. 88-1
Edward Hosley Declaration	ECF No. 88-1
John Hart Declaration	ECF No. 88-1
Qaasim Berry Declaration	ECF No. 111-1
Calar Braxton Declaration	ECF No. 111-1
Cedrik Brookins Declaration	ECF No. 111-1
Norman Copper Declaration	ECF No. 111-1
Zyen Corker Declaration	ECF No. 111-1

Carlos Duprey Declaration	ECF No. 111-1
Michael Flynn Declaration	ECF No. 111-1
Donovin Forth Declaration	ECF No. 111-1
Levi Gupton Declaration	ECF No. 111-1
Dwayne Henry Declaration	ECF No. 111-1
Antoine Randolph Declaration	ECF No. 111-1
Caez Robinson Declaration	ECF No. 111-1
Joseph Rue Declaration	ECF No. 111-1
Quatez Scott Declaration	ECF No. 111-1
James Tolbert Declaration	ECF No. 111-1
Tyri Washington Declaration	ECF No. 111-1
Russell Watson Declaration	ECF No. 111-1
Sherdina Williams Declaration	ECF No. 111-1
Ronnie Boone Declaration	ECF No. 113-2
Donald Brown Declaration	ECF No. 113-2
Deonte Davis Declaration	ECF No. 113-2
Francisco Fernandez Declaration	ECF No. 113-2
Marcus Garcia Declaration	ECF No. 113-2

Troy Harley Declaration	ECF No. 113-2
Tyri Jackson-Wallace Declaration	ECF No. 113-2
Christian Maldonado Declaration	ECF No. 113-2
Nathan Milhouse Declaration	ECF No. 113-2
Michael Ortiz Declaration	ECF No. 113-2
Lewis Page Declaration	ECF No. 113-2
John Ridriguez Declaration	ECF No. 113-2
Blair Rucker Declaration	ECF No. 113-2
Jennifer Sherwood Declaration	ECF No. 113-2
Tyeem Sturgis Declaration	ECF No. 113-2
Jurrell White Declaration	ECF No. 113-2
Jamie Wright Declaration	ECF No. 113-2
OOCT Charts (CFCF, PICC, RCF)	
CFCF Quarantine Chart	
PICC Quarantine Chart	
RCF Quarantine Chart	
Overall PDP Staffing Chart	
Percent Staff Not Reporting Chart	
Deputy Warden reports (previously submitted to the Court)	
Reports, evaluations, and audits	

Class members' medical records	
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Plaintiffs reserve the right to supplement or amend this exhibit list. Plaintiffs further reserve the right to use as an exhibit any document listed as an exhibit by Defendants or produced in discovery or submitted to the Court in this case. Plaintiffs further reserve the right to use any document on cross-examination or for impeachment purposes.

Respectfully submitted,

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